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October 29, 1999

**HAND DELIVERY**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

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**FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY**

Re: In the Matter of Information Sought on Methods for Verifying Compliance with  
E911 Accuracy Standards, ET Docket No. 99-300

Dear Ms. Salas:

AT&T Wireless Services, Inc. ("AT&T") submits this letter in response to the Office of Engineering and Technology's and the Wireless Telecommunications Bureau's October 8, 1999 Notice requesting technical information for measuring the accuracy of Enhanced 911 ("E-911") systems for locating wireless callers.<sup>1/</sup> OET and the Wireless Bureau indicate that the technical information provided will be used to develop guidelines for test procedures for verifying compliance with the Commission's new accuracy standards for Phase II automatic location identification ("ALI") services.<sup>2/</sup> OET and the Wireless Bureau have also identified and asked for comment on specific compliance testing issues.

AT&T appreciates having the opportunity to work with OET and the Wireless Bureau to develop appropriate measures for evaluating and determining the accuracy of Phase II ALI services. AT&T is committed firmly to meeting the Commission's Phase II ALI requirements, but like most wireless carriers, AT&T is currently reviewing and evaluating all potential technical options for meeting these obligations. As a result of the new rules set forth in the Third Report and Order, AT&T is in the process of determining which technical solution best suits the

<sup>1/</sup> "Information Sought on Methods for Verifying Compliance with E911 Accuracy Standards," Docket No. ET 99-300, Public Notice, DA 99-2130 (rel. Oct. 8, 1999) ("Notice").

<sup>2/</sup> See Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Third Report and Order, FCC 99-245 (rel. Oct. 6, 1999) ("Phase II Third Report and Order").

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company's and its subscribers' needs. In addition, the information requested by OET and the Bureau is vastly more detailed than carriers reasonably can be expected to produce in the short timeframe provided. In order to be responsive, AT&T is submitting this letter, but plans to submit additional information on this subject in the future.

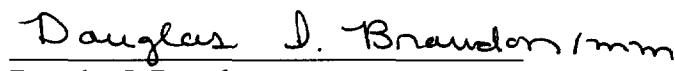
First, AT&T urges the Commission to make the needs of current and future wireless customers its first priority. Although the vigorous competition in the wireless market has caused rates for wireless service to fall steadily, costs remain an obstacle for many Americans who would otherwise embrace wireless service for the enhanced safety, productivity, and convenience it provides. The Commission should ensure that the requirements it places upon wireless carriers in this proceeding are not so onerous and costly that they result in increased wireless service rates, and thereby discourage consumers from subscribing to the very services the Commission is seeking to promote.

Second, the Commission's reporting requirements should provide carriers with sufficient flexibility to utilize the full gamut of available testing and forecasting methodologies, not unlike those routinely deemed acceptable by the Commission today for various purposes. For instance, AWS urges the Commission to allow use of type acceptance (for handsets) and predictive modeling methods to demonstrate the compliance of Phase II E911 technologies. Moreover, location technology vendors should be held responsible for developing the types of predictive modelling and testing techniques most appropriate for their specific technologies. Finally, the Commission should continue its wise policy of technological neutrality with regard to wireless E-911 implementation by carefully avoiding any compliance verification requirements that could inadvertently advantage one technology over another.

AT&T recognizes the importance of expeditiously developing and adopting methods for verifying the accuracy of Phase II ALI services. To ensure the widespread deployment of such services to consumers, however, the Commission should ensure that the verification guidelines it adopts do not result in increased rates for wireless consumers. The Commission should also continue its course of technological neutrality by not adopting verification guidelines that inadvertently advantage one technology over another.

Respectfully submitted,

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